

# STATE OF NEBRASKA

## POWER REVIEW BOARD



**Pete Ricketts**  
Governor

September 28, 2018

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and General Counsel  
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The Honorable Kimberly Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: ER18-2243-000 & ER18-2445-00; Comments of the Nebraska Power Review Board  
in support of the Missouri Public Service Commission's Comments

The Nebraska Power Review Board (NPRB) joins the Missouri Public Service Commission and the South Dakota Public Utilities Commission in support of the SPP-AECI Morgan Transformer Project and its related cost allocation methodology as filed by the Southwest Power Pool (SPP) in FERC Dockets ER18-2243 and ER-2245. The Nebraska Power Review Board is the state agency in Nebraska with primary jurisdiction over electric power suppliers. The Board has a representative on the SPP's Regional State Committee.

The NPRB believes that allocating the costs for the project on a Load Ratio Share using the Region-wide Charge so the costs are assessed to all SPP Transmission Customers as proposed in the SPP's filings results in just and reasonable rates. The nature of the project is such that benefits will accrue across the entire SPP footprint through reduced uplift and decreased adjusted production costs. These region-wide benefits indicate that regional funding is equitable and appropriate. The Board agrees with SPP's analyses indicating that the project will provide significant benefits to the entire SPP Region.

As with the Missouri and South Dakota Commissions, the NPRB points out that the SPP Regional State Committee unanimously supported the regional cost allocation methodology for the Morgan Transformer Project.

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Columbus

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Norfolk

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The Honorable Kimberly Bosc  
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The Nebraska Power Review Board therefore joins with the Missouri Public Service Commission and the South Dakota Public Utilities Commission in support of the cost allocation proposal as filed.

Respectfully Submitted,



Frank Reida  
Chairman



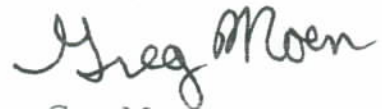
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Greg Moen  
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